



May 8, 2018

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte Communication, MM Docket No. 12-107

Dear Ms. Dortch:

On May 3, 2018, Anthony Stephens of the American Council of the Blind (ACB), Mark Richert of the American Foundation for the Blind (AFB) and the undersigned of the National Association of Broadcasters (NAB) (collectively, Petitioners) met with Commission staff (see list below) to discuss issues raised in our Petition for a waiver extension of 47 C.F.R. § 79.2(b)(2)(ii),¹ requiring that broadcasters aurally describe visual but non-textual emergency information.

Petitioners reiterated that, although we have worked diligently to identify a mechanism for aurally describing radar maps and other dynamic graphic images in emergency crawls, a technical solution that can be integrated into the current broadcasting system remains a challenge. Developers are unable to resolve the problem of how to generate an audible crawl when the software used to automatically create dynamic images do not contain text files that can be converted into speech.

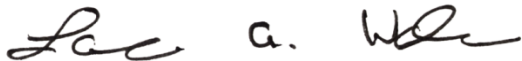
We explained that our request for a five-year extension of the current rule waiver, which expires on May 26, 2018, is justified and appropriate because this will allow time for industry to transition to technologies with greater potential for integrating an efficient technical solution. We noted that, to our knowledge, the emergency information conveyed in a dynamic image in nearly all cases is duplicative of that captured in an accompanying text crawl that is aurally described; thus, a further extension will not unduly harm consumers.

Petitioners also pointed out that our extension request is consistent with a recently approved recommendation of the Commission's Disability Advisory Committee (DAC). Finally, we reinforced our commitment to continue working toward the development of such a solution that may be integrated into the current broadcasting system.

¹ Joint Petition for Extension of Waiver of the American Council of the Blind, the American Foundation for the Blind, and the National Association of Broadcasters, MB Docket No. 12-107 (filed Mar. 23, 2018) (Petition).

In addition, we discussed potential research to help identify the critical elements of emergency information that are conveyed by a dynamic image and should be aurally described for the benefit of persons who are blind or visually impaired.² Such an effort could improve the effectiveness of aurally described emergency text crawls, and potentially provide an alternative resolution to the challenges described in the Petition until an effective technical solution can be developed.

Respectfully submitted,



Larry Walke
Associate General Counsel
Legal and Regulatory Affairs
National Association of Broadcasters

Commission Staff Meeting Participants

Media Bureau

Martha Heller
Maria Mullarkey
Jonathan Mark

Consumer and Governmental Affairs Bureau

Karen Peltz Strauss
Suzanne Singleton
Eliot Greenwald
Debra Patkin
Will Schell

cc: Martha Heller, Maria Mullarkey, Jonathan Mark, Karen Peltz Strauss, Suzanne Singleton, Eliot Greenwald, Debra Patkin, Will Schell

² 47 C.F.R. § 79.2, Note to Paragraph (a)(2).